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11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13

14 AMERICAN CIVIL LIBERTIES
15 UNION FOUNDATION OF
SOUTHERN CALIFORNIA,

16 Plaintiff,

17 v.

18 UNITED STATES IMMIGRATION
19 AND CUSTOMS ENFORCEMENT, et
al.

20 Defendants.
21

No. 2:22-cv-04760-SHK

22 **SECOND SUPPLEMENTAL**
23 **DECLARATION OF**
24 **CATRINA M. PAVLIK-KEENAN**

25 Honorable Shashi H. Kewalramani
26 United States Magistrate Judge
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1 **I. INTRODUCTION**

2 I, Catrina M. Pavlik-Keenan, pursuant to 28 U.S.C. § 1746, hereby declare as
3 follows:

4 1. I am the Deputy Chief Freedom of Information Act (“FOIA”) Officer for
5 the Privacy Office of the U.S. Department of Homeland Security (“DHS” or the
6 “Department”). I have held my current position since July 4, 2021.

7 2. This declaration supplements my two prior declarations dated May 23,
8 2023, (Dkt. 123 at pp. 6-10), and June 6, 2025 (Dkt. 128-1) to further explain the work
9 of DHS-FOIA and in support of DHS’s Opposition to Plaintiff’s Motion to Enforce (Dkt.
10 125).

11 **II. CRCL’s Release Activity**

12 3. Previously, I averred that DHS-FOIA was unable to completely verify the
13 original OCIO search results, on May 28, 2025, DHS-FOIA repeated the two searches
14 with the previously agreed upon search terms. *See* Dkt. 128-1, ¶ 6. These searches
15 originally yielded roughly 596,000 pages after deduplication. *Id.*, ¶ 7. As it stated it
16 would, DHS-FOIA performed a more detailed and in-depth keyword search of these
17 search results, as well as performed an initial responsiveness review, to ensure DHS-
18 FOIA would adequately process responsive records to the Plaintiff’s FOIA request that
19 DHS CRCL would have in its possession and control that DHS Office of Inspector
20 General and ICE would not have.

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4. DHS-FOIA was able to reduce this number significantly to 1,399 pages. DHS-FOIA now plans to immediately begin processing these records on a rolling basis at a rate of 700 pages per month consistent with its present processing rate and ability, with the first production and response expected on July 7, 2025. DHS-FOIA plans to complete processing of the responsive records no later than August 4, 2025.

Under penalty of perjury, pursuant to 28 U.S.C. § 1746, I declare the foregoing is true and correct to the best of my knowledge and belief. Signed this 10th day of June 2025.

CATRINA M

PAVLIK KEENAN

CATRINA M. PAVLIK-KEENAN

Digitally signed by CATRINA M
PAVLIK KEENAN

Date: 2025.06.10 09:19:50
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